

**REVISION OF EOSR – Renumbered items on page 2 and
revised final date of comments received**

EXECUTIVE OFFICER SUMMARY REPORT
November 13, 2002

ITEM: 14

SUBJECT: NPDES PERMIT REVISION: CITY OF SAN DIEGO, SOUTH BAY WATER RECLAMATION PLANT DISCHARGE TO THE PACIFIC OCEAN THROUGH THE SOUTH BAY OCEAN OUTFALL (TENTATIVE ADDENDUM NO. 1 TO ORDER NO. 2000-129, NPDES PERMIT NO. CA0109045) (*David Hanson*)

PURPOSE: To consider modifications to the waste discharge requirements and NPDES permit for the City of San Diego's South Bay Water Reclamation Plant (SBWRP) discharge through the South Bay Ocean Outfall (SBOO).

PUBLIC NOTICE: A newspaper notice was published in the San Diego Union-Tribune on October 11, 2002. Copies of tentative Addendum No. 1 were mailed on October 11, 2002 to the discharger and all known interested parties and agencies. These actions served as the 30-day official public notification for this action, as required by Title 40, section 124.10 of the Code of Federal Regulations (CFR).

DISCUSSION: Several events have led to the preparation of tentative Addendum No. 1, including:

1. During adoption of Order No. 2000-129 at its August 13, 2000 meeting, this Regional Board requested that all references to the CFR be reviewed and updated. The Regional Board was informed at the time that the permit would be revised to incorporate these updates at a future meeting.
2. USEPA approval of the 2001 California Ocean Plan was issued on December 3, 2001.
3. By letter dated August 8, 2002, the City of San Diego requested several changes to reporting schedules, sampling protocols, toxicity testing protocols, land outfall monitoring, and other minor administrative provisions specified in Order No. 2000-129 and the associated monitoring and reporting program. A copy of the letter is attached.

If adopted, tentative Addendum No. 1 would:

1. Replace the acute toxicity limit taken from “Table A” of the 1997 Ocean Plan with a new limit calculated from the acute toxicity water quality objective listed in “Table B” of the 2001 Ocean Plan.
2. Change the due date of the annual pretreatment report to be consistent with the City’s Point Loma Metropolitan Wastewater Treatment Plant (PLMWTP) monitoring and reporting program.
3. Incorporate the concept of “minimum levels” as introduced by the 2001 Ocean Plan.
4. Update provisions for compliance with acute and chronic acute toxicity limitations.
5. Update references to the CFR in Attachments 3 and 4
6. Change the frequency of acute toxicity monitoring from weekly to monthly.
7. Change references to the 1997 Ocean Plan to the 2001 Ocean Plan.

As of **November 6, 2002**, no written comments have been received from the public or the discharger.

LEGAL CONCERNS:

None

SUPPORTING
DOCUMENTS:

1. Tentative Addendum No. 1 to Order No. 2000-129, NPDES Permit No. CA0109045
2. Transmittal Letter dated October 11, 2002
3. Notice of Public Hearing dated October 11, 2002
4. Letter from City of San Diego dated August 8, 2002
5. City of San Diego wastewater facilities map

SIGNIFICANT
CHANGES FROM
CURRENT ORDER:

Of the changes contained in tentative Addendum No. 1 the following could be considered significant:

1. Acute Toxicity Limit – One of the amendments contained in the 2001 Ocean plan is the replacement of the acute toxicity effluent limitation in “Table A” with an acute toxicity water quality objective. The new limit specified in tentative Addendum No. 1 was calculated using the methods prescribed in the 2001 Ocean Plan. The new marine species testing protocols specified in tentative Addendum No. 1 are also consistent with the methods prescribed in the 2001 Ocean Plan and PLMWTP permit (Order No. R9-2002-0025, NPDES Permit No. CA0107409). The SBWRP has shown consistent compliance with the existing acute toxicity limit since startup

and is expected to remain in compliance using the new limit and new marine species testing protocols contained in tentative Addendum No. 1.

2. Acute Toxicity Monitoring Frequency – Tentative Addendum No. 1 reduces the required acute toxicity testing frequency from weekly to monthly. There are several reasons why this change is appropriate. First, the existing requirement for weekly testing is excessive when compared to other discharges in the area. The United States International Boundary and Water Commission's South Bay International Wastewater Treatment Plant (SBIWTP) effluent, which also discharges through the SBOO, is required to be sampled for acute toxicity monthly. The PLMWTP effluent is required to be sampled for acute toxicity semi-annually. Second, the SBWRP utilizes secondary treatment compared to only advanced primary treatment at the SBIWTP and PLMWTP. Third, the 2001 Ocean Plan only requires that discharges with minimum initial dilution factors ranging from 100:1 to 350:1 (the SBOO has a minimum initial dilution factor of 100:1) be sampled for chronic toxicity and leaves it up to the Regional Boards to decide whether to require acute toxicity testing as necessary to protect the beneficial uses of ocean waters. Monthly testing should provide more than adequate data characterizing the facility's effluent.

COMPLIANCE
RECORD:

Violation	Description
BOD Limits	The facility began operation on May 6, 2002. BOD limits were exceeded May 9 through May 14. However, the system has been consistently in compliance since.
Chronic Toxicity	The daily maximum chronic toxicity effluent limitation (100 TUc) was exceeded for the month of May based on results of the 7-day renewal test of Topsmelt growth (>400 TUc). However, the system has been consistently in compliance since.

RECOMMENDATION:

Adoption of tentative Addendum No. 1 to Order No. 2000-129, NPDES Permit No. CA0109045.